

Rachael D. Lamkin (SBN 246066)
Karan Singh Dhadialla (SBN 296313)
BAKER BOTTS L.L.P.
101 California Street, Suite 3200
San Francisco, California 94111
Phone: (415) 291-6200
Fax: (415) 291-6300
rachael.lamkin@bakerbotts.com
karan.dhadialla@bakerbotts.com

Attorneys for Defendant, NETFLIX, INC.

Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**DEFENDANT NETFLIX, INC.'S
NOTICE OF SUPPLEMENTAL EVIDENCE
IN SUPPORT OF ITS MOTION FOR
PRELIMINARY INJUNCTION**

Judge: Hon. Jon S. Tigar
Date: September 21, 2023
Time: 2:00 p.m.
Crtrm: 6 – 2nd Floor

**DEFENDANT NETFLIX, INC.'S NOTICE OF SUPPLEMENTAL EVIDENCE
IN SUPPORT OF ITS MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Court Order, Dkt. No. 166, Netflix files supplemental evidence obtained after PI briefing has closed, *i.e.*, excerpts from the deposition of Mr. Valjakka's damages expert, attached as Exhibit A and dated September 8, 2023.

Redacted portions are the price of the CDN license and one term, contained under seal at Dkt. No. 126-3.

Dated: September 20, 2023

Respectfully submitted,

/s/ Rachael D. Lamkin

Rachael D. Lamkin (SBN 246066)
Karan Singh Dhadialla (SBN 296313)
BAKER BOTTS L.L.P.
101 California Street, Suite 3200
San Francisco, CA 94111
Tel: (415) 291-6200
Fax: (415) 291-6300
rachael.lamkin@bakerbotts.com
karan.dhadialla@bakerbotts.com

Sarah E. Piepmeier, Bar No. 227094
SPiepmeier@perkinscoie.com
Elise S. Edlin, Bar No. 293756
EEdlin@perkinscoie.com
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, California 94105
Telephone: +1.415.344.7000
Facsimile: +1.415.344.7050

Janice L. Ta (appearance pro hac vice)
JTa@perkinscoie.com
PERKINS COIE LLP
405 Colorado Street Suite 1700
Austin, Texas 78701
Telephone: +1.737.256.6100
Facsimile: +1.737.256.6300

Jassiem N. Moore (appearance pro hac vice)
JassiemMoore@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000

Brianna Kadjo, Bar No. 303336
BKadjo@perkinscoie.com
PERKINS COIE LLP
1900 Sixteenth Street, Suite 1400
Denver, Colorado 80202-5255
Telephone: +1.303.291.2300
Facsimile: +1.303.291.2400

Attorneys for Defendant, NETFLIX, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28